HAFETZ NECHELES & ROCCO

ATTORNEYS AT LAW

500 FIFTH AVENUE NEW YORK, N.Y. IQIIO

TELEPHONE: (2 | 2) 997-7595 TELECOPIER: (2 | 2) 997-7646 E-MAIL: INFO@HNRLAWOFFICE\$.COM

March 19, 2012

VIA EMAIL AND ECF

Carolyn Pokorny, Esq.
Roger Burlingame, Esq.
Todd Kaminsky, Esq.
Unites States Attorney's Office
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Pedro Espada, Jr., et al., 10-CR-985 (FB)

Dear Ms. Pokorny,

Today Ms. Cruz testified that she could not determine whether the following exhibits were complete and accurate copies of the documents that she maintained in her office:

- A71 (bates stamped MC679-871)
- A72 (bates stamped MC4433-4436)
- A73 (bates stamped MC4384-4398)
- 87a (bates stamped MC1979-1994)

HAFETZ NECHELES & ROCCO

Accordingly, please produce in court the originals of these documents and any other policy and procedure manuals or employee handbooks that were seized from Ms Cruz's office.

Very truly yours,

By: /s/Susan R. Necheles
Susan R. Necheles
Hafetz Necheles & Rocco
500 Fifth Avenue, 29th Floor
New York, NY 10110
Telephone: (212) 997-7595
Facsimile: (212) 997-7646
Attorney for Pedro Espada Jr.

/s/ Russell Gioiella
Russell Gioiella
Litman Asche & Gioiella
140 Broadway
New York, NY 10005
Telephone: (212) 809-4500
Facsimile: (646) 607-9643
Attorney for Pedro Gautier Espada